

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.,  
CUSTOMER DATA SECURITY  
BREACH LITIGATION**

*This Document Relates To:  
All Actions*

No. 19-md-2904 (MCA) (MAH)

**DECLARATION OF JOSEPH J.  
CAVANAUGH, ESQ. IN SUPPORT  
OF MOTION FOR *PRO HAC VICE*  
ADMISSION OF JOSEPH J.  
CAVANAUGH, ESQ.**

I, Joseph J. Cavanaugh, Esq., pursuant to 28 U.S.C. § 1746, declare:

1. I am a senior associate at the law firm of Hogan Lovells US LLP located at 555 Thirteenth Street, NW, Washington, D.C. 20004. Hogan Lovells US LLP, and our co-counsel McCarter & English, LLP represent Defendants Laboratory Corporation of America Holdings and Laboratory Corporation of America. I submit this Declaration in support of my application for admission *pro hac vice* pursuant to Local Civil Rule 101.1(c).

2. I am a member in good standing of the District of Columbia Bar. The roll of members for the District of Columbia Bar is maintained by the District of Columbia Court of Appeals' Committee on Admissions, 430 E Street NW, Room 123, Washington, DC 20001. I was admitted to the District of Columbia Bar in 2019.


3. I am a member in good standing of the United States District Court for the District of Columbia. The roll of members of the United States District Court for the District of Columbia is maintained by the Clerk's Office, U.S. District Court for the District of Columbia, 333 Constitution Avenue, N.W., Room 1225, Washington, D.C. 20001. I was admitted to practice in the United States District Court for the District of Columbia in 2022.

4. I am a member in good standing of the United States District Court for the District of Colorado. The roll of members of the United States District Court for the District of Colorado is maintained by the Clerk's Office, U.S. District Court for the District of Colorado, 901 19th Street, Room A105, Denver, CO 80294. I was admitted to practice in the United States District Court for the District of Colorado in 2022.

5. There are no disciplinary proceedings pending against me in any jurisdiction. No discipline has previously been imposed on me in any jurisdiction. I understand my continuing obligation during the period of my admission to advise the Court of any disciplinary proceeding that may be instituted against me.

6. I agree to pay the Clerk's fee and the appropriate fees for the client fund and agree to abide by L. Civ. R. 101.1(c).

Dated: January 9, 2025



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